Atty. Dkt. No. CRUI/0026

IN THE DRAWINGS:

The attached sheet of drawings includes changes to sheet 2. This sheet

replaces the original sheet. Fig. 7 has been added to sheet 2 to overcome a drawing

objection raised by the Examiner.

**Attachment: Replacement Sheet** 

#### REMARKS

In the Advisory Action dated February 2, 2006, the Examiner indicated that the response to the Final Office Action dated November 18, 2005, which was mailed on January 18, 2006, would not be entered because new issues were raised by the amendments proposed therein. In response, Applicants are filing a RCE and a Second Response to Final Office Action dated November 18, 2005, having a shortened statutory period for response extended one month set to expire on March 18, 2006. The Second Response to Final Office Action is filed in place of the Response to Final Office Action mailed on January 18, 2006. Please reconsider the claims pending in the application for reasons discussed below.

### **Drawings**

The Examiner objected to the drawings under 37 C.F.R. § 1.83(a) because a restraining member comprising a separate component coupled to the respective expandable tubing section to form the hinge therebetween was not shown in the drawings. In response, Applicants have added Figure 7 to illustrate a restraining member as a separate component. Applicants respectfully request the objection to the drawings be removed.

#### Claim Objections

The Examiner objected to claim 1 because of certain informalities. Applicants have cancelled claim 1, thereby obviating the rejection.

### Claim Rejections Under 35 U.S.C. § 102

The Examiner rejected claims 1-6, 9-15, 71-76, and 80 under 35 U.S.C. § 102(b) as being anticipated by *Campbell* '745. The Examiner rejected claims 43 and 47-50 under 35 U.S.C. § 102(b) as being anticipated by *Lohbeck*. The Examiner rejected claims 56-61, 63-65, 81-82, and 84 under 35 U.S.C. § 102(e) as being anticipated by *Campbell, et al.*, '109. Applicants have cancelled claims 1-6, 9-15, 43, 47-50, 56-61, 63-65, 71-76, 80, 81-82, and 84, thereby obviating the rejection.

The Examiner rejected claims 16, 24, and 77-78 under 35 U.S.C. § 102(b) as being anticipated by *Strickland, et al.* (U.S. 4,770,448). In response, Applicants have amended claim 24 to include the limitations of claim 27. Additionally, Applicants have cancelled claims 16 and 77-78.

As amended, claim 24 includes the limitation of the lead thread flanks of the threaded male portion disposed at an angle different from that of the lead thread flanks of the threaded female portion. Strickland, et al. does not show the lead thread flanks of a threaded male portion disposed at an angle different from that of the lead thread flanks of a threaded female portion. Rather, Strickland, et al. discloses a coupling whereby the thread angle and the pitch are varied not the thread flank angle. (See Strickland, et al. col. 3, lines 15-20) In fact, Strickland, et al. states the axial load distribution between the individual thread flanks is achieved by making the female thread pitch of the coupling longer by an increment in comparison to the pitch of the male thread on the pipe. (See Strickland, et al. col. 3, lines 24-26) Therefore, Strickland, et al. fails to teach each and every limitation in claim 24. This failure precludes Strickland, et al. from anticipating claim 24. Applicants submit that claim 24 is in condition for allowance and respectfully request withdrawal of the § 102(b) rejection.

Additionally, claim 25 depends from claim 24 and this claim is allowable for at least the same reasons as claim 24.

# Claim Rejections Under 35 U.S.C. § 103(a)

The Examiner rejected claims 20-23 and 26 as being obvious over *Strickland, et al.* Applicants respectfully traverse the rejection. Claims 20-23 depend from claim 16 and claim 26 depends from claim 24. As set forth above, *Strickland, et al.* fails to disclose all the limitations of claims 16 and 24. Therefore, claims 20-23 and 26 are allowable for at least the same reasons as claims 16 and 24.

The Examiner rejected claims 67-70 as being obvious over *Campbell* '745 in view of PCT WO 00/0831. Applicants have cancelled claims 67-70, thereby obviating the rejection.

### Allowable Subject Matter

The Examiner objected to claims 7-8 and 51-53 as being dependent upon a rejected base claim, but would be allowable if rewritten in independent form including all of the limitations of the base claim and intervening claims. In response, Applicants have rewritten claims 7-8 and 51-53 as new claims 85-89, respectively. Applicants believe that new claims 85-89 are in condition for allowance and respectfully request the same.

## Priority under 35 U.S.C § 119

According to the Office Action Summary, the Examiner indicated that none of the certified copies of the priority documents have been received. In response, Applicants respectfully directs the Examiner to the Claim to Priority that was filed on December 4, 2003. For convenience, a copy of the Claim to Priority is attached herewith.

#### **New Claims**

New claims 90-100 have been added to claim aspects of the present invention. Applicants submit that no new matter has been added. Further, Applicants believe that the references cited by the Examiner do not disclose a tubing connection arrangement comprising a first expandable tubing section having a threaded male portion with lead and back thread flanks and a second expandable tubing section having a threaded female portion with lead and back thread flanks, wherein the lead thread flanks of the threaded male portion are disposed at an angle different from that of the lead thread flanks of the threaded female portion, as recited in new claims 90-98. Applicants believe that the references cited by the Examiner do not disclose a tubing connection comprising a first expandable tubing section having a threaded male portion with lead and back thread flanks and a second expandable tubing section having a threaded female portion with lead and back thread flanks, wherein the lead thread flanks of the threaded male portion are disposed at an angle different from that of the lead thread flanks of the threaded female portion and the back thread flanks of the threaded portions are configured such that the respective threaded portions are angled away from an adjacent end of the respective tubing section, as recited in new claims 99100. Therefore, Applicants believe that new claims 90-100 are in condition for allowance and respectfully request the same.

# Conclusion

Having addressed all issues set out in the Final Office Action, Applicants respectfully submit that the claims are in condition for allowance and respectfully request that the claims be allowed.

Respectfully submitted,

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